

REGISTRATION REPORT

Part A

Risk Management

Product name: VITIPPEC GOLD WG ADVANCE

Active Substances:

fosetyl-aluminium, 500 g/kg

folpet, 250 g/kg

cymoxanil, 40 g/kg

COUNTRY: FRANCE

Southern Zone

Zonal Rapporteur Member State: France

NATIONAL ASSESSMENT FRANCE

(new application)

Applicant: SAPEC AGRO S.A.

Date: 2018/11/12

Table of Contents

1	DETAILS OF THE APPLICATION	3
1.1	APPLICATION BACKGROUND.....	3
1.2	ACTIVE SUBSTANCE APPROVAL.....	3
1.3	REGULATORY APPROACH.....	5
1.4	DATA PROTECTION CLAIMS	6
1.5	LETTER(S) OF ACCESS.....	6
2	DETAILS OF THE AUTHORISATION	6
2.1	PRODUCT IDENTITY.....	6
2.2	CLASSIFICATION AND LABELLING.....	7
2.2.1	<i>Classification and labelling in accordance with Regulation (EC) No1272/2008.....</i>	<i>7</i>
2.2.2	<i>Other phrases in compliance with Regulation (EU) No 547/2011</i>	<i>7</i>
2.2.3	<i>N/AOther phrases linked to the preparation</i>	<i>7</i>
2.3	PRODUCT USES.....	8
3	RISK MANAGEMENT.....	10
3.1	REASONED STATEMENT OF THE OVERALL CONCLUSIONS TAKEN IN ACCORDANCE WITH THE UNIFORM PRINCIPLES.....	10
3.1.1	<i>Physical and chemical properties.....</i>	<i>10</i>
3.1.2	<i>Methods of analysis</i>	<i>10</i>
3.1.3	<i>Mammalian Toxicology.....</i>	<i>10</i>
3.1.4	<i>Residues and Consumer Exposure</i>	<i>12</i>
3.1.5	<i>Environmental fate and behaviour.....</i>	<i>13</i>
3.1.6	<i>Ecotoxicology.....</i>	<i>13</i>
3.1.7	<i>Efficacy</i>	<i>15</i>
3.2	CONCLUSIONS ARISING FROM FRENCH ASSESSMENT	15
3.3	SUBSTANCES OF CONCERN FOR NATIONAL MONITORING	15
3.4	FURTHER INFORMATION TO PERMIT A DECISION TO BE MADE OR TO SUPPORT A REVIEW OF THE CONDITIONS AND RESTRICTIONS ASSOCIATED WITH THE AUTHORISATION.....	15
3.4.1	<i>Post-authorisation monitoring.....</i>	<i>15</i>
3.4.2	<i>Post-authorisation data requirements.....</i>	<i>15</i>
3.4.3	<i>Label amendments (see label in Appendix 2):</i>	<i>15</i>
	APPENDIX 1 – COPY OF THE FRENCH DECISION	16
	APPENDIX 2 – COPY OF THE DRAFT PRODUCT LABEL AS PROPOSED BY THE APPLICANT	19
	APPENDIX 3 – LETTER(S) OF ACCESS.....	26

PART A – Risk Management

The company SAPEC AGRO S.A. has requested marketing authorisation in France for the product VITIPEC GOLD WG ADVANCE, containing 500 g/kg fosetyl-aluminium, 250 g/kg folpet and 40 g/kg cymoxanil for use as a fungicide.

The risk assessment conclusions are based on the information, data and assessments provided in Registration Report, Part B Sections 1-7 and Part C, and where appropriate the addenda for France. The information, data and assessments provided in Registration Report, Part B include assessment of further data or information as required at national registration by the EU peer review. It also includes assessment of data and information relating to VITIPEC GOLD WG ADVANCE where those data have not been considered in the EU peer review process. Otherwise assessments for the safe use of VITIPEC GOLD WG ADVANCE have been made using endpoints agreed in the EU peer review of fosetyl-aluminium, folpet and cymoxanil.

This document describes the specific conditions of use and labelling required for France for the registration of VITIPEC GOLD WG ADVANCE.

Appendix 1 of this document provides a copy of the French Decision.

Appendix 2 of this document is a copy of the draft product label as proposed by the applicant.

Appendix 3 of this document is a copy of the letter(s) of access.

1 DETAILS OF THE APPLICATION

1.1 Application Background

The present registration report concerns the evaluation of SAPEC AGRO S.A.'s application to market VITIPEC GOLD WG ADVANCE in France as a fungicide (product uses described under point 2.3). France acted as a zonal Rapporteur Member State (zRMS) for this request and assessed the application submitted for the first authorisation of this product in France and in other MSs of the Southern zone.

1.2 Active substance approval

Fosetyl-aluminium

Commission Implementing Regulation (EU) No 540/2011 of 25 May 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances.

Specific provisions of regulation were as follows :

PART A

Only uses as fungicide may be authorised.

PART B

For the implementation of the uniform principles as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on fosetyl, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 4 April 2006 shall be taken into account.

In this overall assessment Member States:

— must pay particular attention to the protection of birds, mammals, aquatic organisms and non-target arthropods.

Conditions of authorisation should include risk mitigation measures, where appropriate, such as buffer zones.

The concerned Member States shall request the submission of further studies to confirm the risk assessment for

non-target arthropods, in particular with regard to in-field recovery, and for herbivorous mammals. They shall ensure that the notifier at whose request fosetyl has been included in this Annex provide such studies to the Commission within two years from the approval

An EFSA conclusion is available (EFSA Scientific Report (2005) 54, 1-79).

Review Reports are available (SANCO/10015/06 final, 4 April 2006 [Annex I inclusion]; (SANCO/10015/06 final, 20 November 2012 [confirmatory data]).

There is also an EFSA conclusion on the peer review of the pesticide risk assessment of the active substance fosetyl, EFSA Journal 2018;16(7):5307 where risks were identified for workers and consumers on the representative uses in grapes, citrus and pome fruits as well as for aquatic organisms in grapes and pome fruits.

Folpet

Commission Implementing Regulation (EU) No 540/2011 of 25 May 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances.

Specific provisions of regulation were as follows :

PART A

Only uses as fungicide may be authorised.

PART B

In assessing applications to authorise plant protection products containing folpet for uses other than winter wheat Member States shall pay particular attention to the criteria in Article 4(3) of Regulation (EC) No 1107/2009, and shall ensure that any necessary data and information is provided before such an authorisation is granted.

For the implementation of the uniform principles as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on folpet, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 29 September 2006 shall be taken into account.

In this overall assessment Member States must pay particular attention to:

- operators and workers safety. Authorised conditions of use must prescribe the application of adequate personal protective equipment;
- the dietary exposure of consumers in view of future revisions of Maximum Residue Levels;
- the protection of birds, mammals, aquatic and soil organisms. Conditions of authorisation should include risk mitigation measures.

The Member States concerned shall request the submission of further studies to confirm the risk assessment for birds, mammals and earthworms. They shall ensure that the notifiers at whose request folpet has been included in this Annex provide such studies to the Commission within two years from the approval.

An EFSA conclusion is available (EFSA Scientific Report (2009) 297, 1-80).

A Review Report is available (SANCO/10032/2006 rev 5, 11 July 2008).

Cymoxanil

Commission Implementing Regulation (EU) No 540/2011 of 25 May 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards the list of approved active substances.

Specific provisions of regulation were as follows :

PART A

Only uses as fungicide may be authorised.

PART B

For the implementation of the uniform principles as referred to in Article 29(6) of Regulation (EC) No 1107/2009, the conclusions of the review report on cymoxanil, and in particular Appendices I and II thereof, as finalised in the Standing Committee on the Food Chain and Animal Health on 28 October 2008 shall be taken into account.

In this overall assessment Member States must pay particular attention to:

- the operator and worker safety and ensure that conditions of use prescribe the application of adequate personal protective equipment;
- the protection of the groundwater, when the active substance is applied in regions with vulnerable soil and/or climatic conditions;
- the protection of aquatic organisms and must ensure that the conditions of authorisation include risk mitigation measures such as buffer zones, where appropriate

An EFSA Conclusion is available (EFSA Scientific Report (2008) 167, 1-116).

A Review Report is available (SANCO/179/08 - final rev 1, 9 July 2010).

1.3 Regulatory Approach

The present application (2016-2612) was evaluated in France by the French Agency for Food, Environmental and Occupational Health & Safety (Anses)¹ in the context of the zonal procedure for all Member States of the Southern zone, taking into account the worst-case uses (“risk envelope approach”)² – the highest application rates over the Southern zone. When risk mitigation measures were necessary, they are adapted to the situation in France.

According to the French law and procedures, specific conditions of use are set out in the Decision letter.

The French Order of 4th May 2017³ provides that:

- unless formally stated in the product authorisation, the pre harvest interval (PHI) is at least 3 days;
- unless formally stated in the product authorisation, the minimum buffer zone alongside a water body is 5 metres;
- unless formally stated in the product authorisation, the minimum re-entry period is 6 hours for field uses and 8 hours for indoor uses.

Drift reduction measures such as low-drift nozzles are not considered within the decision-making process in France. However, drift buffer zones may be reduced under some circumstances as explained in appendix 3 of the above-mentioned French Order.

The current document (RR) based on Anses’s assessment of the application submitted for this product is in compliance with Regulation (EC) no 1107/2009⁴, implementing regulations and French regulations.

¹ French Food Safety Agency, Afssa, before 1 July 2010

² SANCO document “risk envelope approach”, European Commission (14 March 2011). Guidance document on the preparation and submission of dossiers for plant protection products according to the “risk envelope approach”; SANCO/11244/2011 rev. 5

³ Arrêté du 4 mai 2017 relatif à la mise sur le marché et à l'utilisation des produits phytopharmaceutiques et de leurs adjuvants visés à l'article L. 253-1 du code rural et de la pêche maritime <https://www.legifrance.gouv.fr/eli/arrete/2017/5/4/AGRG1632554A/jo/texte>

⁴ REGULATION (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC

The data taken into account are those deemed to be valid either at European Union level or at zonal/national level. This part A of the RR presents a summary of essential scientific points upon which recommendations are based and is not intended to show the assessment in detail.

The conclusions relating to the acceptability of risk are based on the criteria indicated in Regulation (EU) No 546/2011⁵, and are expressed as “acceptable” or “not acceptable” in accordance with those criteria.

Finally, the French Order of 26 March 2014⁶ provides that:

- an authorisation granted for a “reference” crop applies also for “linked” crops, unless formally stated in the Decision
- the “reference” and “linked” crops are defined in Appendix 1 of that French Order.

Thus, at French national level, possible extrapolation of submitted data and the corresponding assessment from “reference” crops to “linked” ones are undertaken even if not clearly requested by the applicant in their dRR, and a conclusion is reached on the acceptability of the intended uses on those “linked” crops. The aim of this Order, mainly based on the EU document on residue data extrapolation⁷ is to supply “minor” crops with registered plant protection products.

Therefore the GAP table (Section 2.3) and Decision may include uses on crops not originally requested by the applicant.

The Decision, as reproduced in Appendix 1, takes also into account national provisions, including national mitigation measures.

1.4 Data Protection Claims

Where protection for data is being claimed for information supporting registration of VITIPEC GOLD WG ADVANCE, it is indicated in the reference lists in Appendix 1 of the Registration Report, Part B Sections 1-7.

1.5 Letter(s) of Access

The applicant has provided letters of access for actives substances data.

2 DETAILS OF THE AUTHORISATION

2.1 Product Identity

Product name (code)	VITIPEC GOLD WG ADVANCE
Authorisation number	Not applicable (not registered in France)
Function	fungicide
Applicant	SAPEC AGRO S.A.
Composition	500 g/kg fosetyl-aluminium 250 g/kg folpet 40 g/kg cymoxanil
Formulation type (code)	water-dispersible granule (WG)

⁵ COMMISSION REGULATION (EU) No 546/2011 of 10 June 2011 implementing Regulation (EC) No 1107/2009 of the European Parliament and of the Council as regards uniform principles for evaluation and authorisation of plant protection products

⁶ <http://www.legifrance.gouv.fr/eli/arrete/2014/3/26/AGRG1407093A/jo>

⁷ SANCO document “guidance document: - Guidelines on comparability, extrapolation, group tolerances and data requirements for setting MRLs”: SANCO/7525/VI/95 - rev.9

Packaging	N/A not registered in France
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2.2 Classification and Labelling

2.2.1 Classification and labelling in accordance with Regulation (EC) No1272/2008

Physical hazards	-	
Health hazards	Acute toxicity (inhal.), hazard category 4 Carcinogenicity category 2 Skin sensitisation, category 1A Reproductive toxicity, category 2	
Environmental hazards	Hazardous to the aquatic environment — chronic hazard, category 2	
Hazard pictograms		
Signal word	Warning	
Hazard statements	H332	Harmful if inhaled.
	H351	Suspected of causing cancer
	H317	May cause an allergic skin reaction
	H361fd	Suspected of damaging fertility. Suspected of damaging the unborn child.
	H411	Toxic to aquatic life with long lasting effects.
Precautionary statements –	<i>For the P phrases, refer to the extant legislation</i>	
Supplementary information (in accordance with Article 25 of Regulation (EC) No 1272/2008)	-	

See Part C for justifications of the classification and labelling proposals.

2.2.2 Other phrases in compliance with Regulation (EU) No 547/2011

N/A not registered in France

2.2.3 N/A Other phrases linked to the preparation

N/A not registered in France

2.3 Product uses

Please note:

When the conclusion is “not acceptable”, the intended use is highlighted in grey and the main reason(s) reported in the remarks.

GAP rev. 1, date: 2018-11-12

PPP (product name/code) VITIPEC GOLD WG ADVANCE Formulation type: water-dispersible granule (WG)
active substance 1 foseetyl-aluminium Conc. of a.s.1: 500 g/kg
active substance 2 folpet Conc. of a.s.2: 250 g/kg
active substance 3 cymoxanil Conc. of a.s.3: 40 g/kg

Applicant: SAPEC AGRO S.A. professional use
Zone(s): southern EU non-professional use

Verified by MS: yes

Crop and/or situation (a)	Zone	Product code	F G or I (b)	Pests or Group of pests controlled (c)	Formulation		Application			Application rate per treatment			PHI (days) (l)	Remarks: (m)
					Type (d-f)	Conc. of as (i)	method kind (f-h)	growth stage & season (j)	number min max (k)	kg as/hL min max	water L/ha min max	kg as/ha min max		
Grapes	France	50% foseetyl Al + 25% folpet + 4% cymoxanil	F	<i>Plasmopara viticola</i>	WG	50% 25% 4%	Tractor-mounted boom spraying	BBCH 53 – 85 (wine grape) BBCH 53-69 (table grape)	3	0.15 + 0.75 + 0.012 - 0.75 + 0.375 + 0.06	200-1000	1.5 + 0.75 + 0.12	28 (wine grape) F BBCH 69 (table grape)	3 kg product/ha 12-14 days between applications Not acceptable unacceptable risk anticipated for workers wearing a working coverall, when re-entering crops treated, Resident and bystander exposures: unacceptable risk

Crop and/ or situation (a)	Zone	Product code	F G or I (b)	Pests or Group of pests controlled (c)	Formulation		Application			Application rate per treatment			PHI (days) (l)	Remarks: (m)
					Type (d-f)	Conc. of as (i)	method kind (f-h)	growth stage season (j)	number & min max (k)	kg as/hL min max	water L/ha min max	kg as/ha min max		

- Remarks:**
- (a) For crops, the EU and Codex classifications (both) should be used; where relevant, the use situation should be described (e.g. fumigation of a structure)
 - (b) Outdoor or field use (F), glasshouse application (G) or indoor application (I)
 - (c) e.g. biting and suckling insects, soil born insects, foliar fungi, weeds
 - (d) e.g. wettable powder (WP), emulsifiable concentrate (EC), granule (GR)
 - (e) GCPF Codes - GIFAP Technical Monograph No 2, 1989
 - (f) All abbreviations used must be explained
 - (g) Method, e.g. high volume spraying, low volume spraying, spreading, dusting, drench
 - (h) Kind, e.g. overall, broadcast, aerial spraying, row, individual plant, between the plants - type of equipment used must be indicated
 - (i) g/kg or g/l
 - (j) Growth stage at last treatment (BBCH Monograph, Growth Stages of Plants, 1997, Blackwell, ISBN 3-8263-3152-4), including where relevant, information on season at time of application
 - (k) The minimum and maximum number of application possible under practical conditions of use must be provided
 - (l) PHI - minimum pre-harvest interval
 - (m) Remarks may include: Extent of use/economic importance/restrictions

3 RISK MANAGEMENT

3.1 Reasoned statement of the overall conclusions taken in accordance with the Uniform Principles

3.1.1 Physical and chemical properties

The formulation VITIPEC GOLD WG ADVANCE is a brown water-dispersible granule with uncharacteristic odour. All studies have been performed in accordance with the current requirements. It is not explosive and has no oxidising properties. It has a self-ignition temperature of 314 °C and is not flammable. In aqueous solution (1 %), its pH is 3.5 at 20 °C. Stability data indicate a shelf life of at least two years at ambient temperature (PET/AI/PE; OPP [oriented polypropylene]/PET/PE, OPP/AI/PE and LDPE). Its technical characteristics are acceptable for a water-dispersible granule formulation except for the results of resistance tests on the granules, which showed that wear was outside acceptable limits. This was taken into account in the risk evaluation for operators and workers.

3.1.2 Methods of analysis

3.1.2.1 Analytical method for the formulation

Analytical methods for the determination of the active substances in the formulation are available and validated.

As the relevant impurities (perchloromethylmercaptan [PCMM] and carbon tetrachloride [tetrachloromethane]) are by-products of the manufacturing process for folpet and as such cannot be formed by storage of the formulation, an analytical method for the determination of relevant impurities in the formulation is not necessary.

3.1.2.2 Analytical methods for residues

Analytical methods are available in the Draft Assessment Report and in this dossier and validated for the determination of residues of folpet, cymoxanil and fosetyl-aluminium in plants (acidic crops), soil, water (surface and drinking) and air. Analytical methods for the determination of residues of the active substances in foodstuffs of animal origin are not necessary since the intended uses (grapes) is not part of animal feeding.

The active substances are neither toxic nor very toxic, hence no analytical method is required for the determination of residues in biological fluids and tissues.

3.1.3 Mammalian Toxicology

Endpoints used in risk assessment

Active Substance: Fosetyl-al			
ADI	3 mg kg bw/d		EU (2007)
ARfD	-		
AOEL	5 mg/kg bw/d		
Dermal absorption	Based on default values according to guidance on dermal absorption (Efsa 2012):		
		Concentrate (used in formulation) 500 g/kg	Spray dilution (used in formulation) 1.5 g/kg
	Dermal absorption endpoints %	25	75

Active Substance: **Cymoxanil**

ADI	0.013 mg kg bw/d		
ARfD	0.08 mg/kg bw	EU (2009)	
AOEL	0.01 mg/kg bw/d		
Dermal absorption	Two in vitro human study performed on the formulation VITIPEC GOLD WG ADVANCE according to guidance on dermal absorption (Efsa 2012)		
		Concentrate (tested) 26 g/kg	Diluted formulation (tested) 0.12 g/kg
	In vitro (human) %	0.3%	11%
		Concentrate (used in formulation) 40 g/kg	Spray dilution (used in formulation) 0.12 g/kg
	Dermal absorption endpoints %	0.3	11

Active Substance: Folpel			
ADI	0.1 mg kg bw/d		
ARfD	0.2 mg/kg bw	EU (2007)	
AOEL	0.1 mg/kg bw/d		
Dermal absorption	Based on an in vitro rat/human study performed on a similar formulation (using <i>pro rata</i> correction)		
		Concentrate (tested) 800 g/L	Diluted formulation (tested) 3.2 g/L
	In vitro (human) %	0.4	1.75
		Concentrate (used in formulation) 250 g/L	Spray dilution (used in formulation) 0.75 g/L
	Dermal absorption endpoints %	2	9

3.1.3.1 Acute Toxicity

VITIPEC GOLD WG ADVANCE has a low acute oral and dermal toxicity. It is not irritant to skin and eyes of rabbits. It is classifiable for inhalational toxicity and skin sensitisation.

3.1.3.2 Operator Exposure

Summary of critical use patterns (worst cases):

Crop	F/G ⁸	Equipment	Application rate kg/L product/ha (g as/ha)	Spray dilution (L/ha)	Model
Grapes	F	Tractor mounted air assisted sprayer	3 kg product/ha	200-1000	EFSA
		Manual hand held	(Fosetyl-al 1,5 kg/ha)		
		Manual knapsack	(Folpel 0.75 kg/ha) (Cymoxanil 0.12 kg/ha)		

Considering proposed uses, operator systemic exposure was estimated using the EFSA model.

⁸ Open field or glasshouse

Crop	Equipment	PPE and/or working coverall	% AOEL Fosetyl-al	% AOEL Folpel	% AOEL Cymoxanil
Grapes	Tractor mounted air assisted sprayer	Working coverall and gloves during mixing/loading and application	5	19	47
	Manual hand held	Working coverall and gloves during mixing/loading and application	0.5	6.2	34
	Manual knapsack	Working coverall and gloves during mixing/loading and application	0.4	3.3	27

According to the model calculations, it can be concluded that the risk for the operator using VITIPEC GOLD WG ADVANCE is acceptable with a working coverall (90% protection factor) and gloves during mixing/loading and application.

3.1.3.3 Bystander Exposure

Considering that there is no acute AOEL assessed for active substances Fosetyl aluminium, Folpel and Cymoxanil, bystander exposure can be considered covered by resident exposure.

3.1.3.4 Resident Exposure

Residential exposure was assessed according to EFSA model with a buffer zone of 5 m (grape). Exposure is estimated to 18 % of the AOEL of Fosetyl-al, 55% of the AOEL of Folpel and **116%** of the AOEL of Cymoxanil **It is concluded that there is an unacceptable risk to the resident exposed to VITIPEC GOLD WG ADVANCE after an application with a tractor mounted with air assisted sprayer or a manual hand held (or manual knapsack) application.**

3.1.3.4 Worker Exposure

Workers may have to enter treated areas after treatment for crop harvesting activities. Therefore, estimation of worker exposure was calculated according to EFSA model. Exposure is estimated to **212 %** of the AOEL of Fosetyl-al, **636%** of the AOEL of Folpel and **1244%** of the AOEL of Cymoxanil.

It is concluded that without taking into account a re-entry period, there is an unacceptable risk anticipated for workers wearing a working coverall, when re-entering crops treated with VITIPEC GOLD WG ADVANCE

3.1.4 Residues and Consumer Exposure

3.1.4.1 Residues

Primary crop metabolisms were sufficiently investigated to define residue of fosetyl, folpet and cymoxanil for enforcement and risk assessment purposes in the crop(s) under consideration.

Regarding the magnitude of residues in grapes, a sufficient number of residue trials is available to support the intended GAPs in France. These data allow it to be considered that no MRL exceedance will result from the intended uses (with a latest time of application of BBCH 69 on table grape).

The effects of processing on the nature of fosetyl residues have been investigated. Data on the effect of processing on the amount of residue have been submitted, but not considered for risk assessment. For folpet, hydrolysis studies showed that folpet is widely converted into phthalimide; besides, processing studies allowed derivation of transfer factors for the production of wine and grape juice. As for cymoxanil, residues did not exceed the trigger value of 0.1 mg/kg in grapes and therefore the effect of industrial and/or household processing is not required.

Residues in succeeding crops are not required as grape is a perennial crop.

As grape is not fed to animals, livestock metabolism and livestock feeding studies are not necessary.

3.1.4.2 Consumer exposure

The toxicological profiles of fosetyl, folpet and cymoxanil were evaluated at EU level, which resulted in the proposal of ADIs (3 mg/kg for fosetyl-Al, 2.8 mg/kg for fosetyl, 2.9 mg/kg for phosphonic acid, 0.1 mg/kg for folpet, 0.013 mg/kg for cymoxanil) and ARfDs (0.2 mg/kg for folpet, 0.08 mg/kg for cymoxanil) that were considered in the framework of this evaluation. For fosetyl-Al, an ARfD was not deemed necessary.

Chronic consumer exposure resulting from the uses proposed in the framework of this application was calculated for the three active substance. Based on EFSA PRIMo (rev2), chronic and acute exposures were considered acceptable for all groups of consumers.

According to available data, no specific mitigation measures should apply.

3.1.5 Environmental fate and behaviour

The fate and behaviour in the environment of the formulation has been evaluated according to the requirements of Regulation (EC) No 1107/2009. Appropriate endpoints from the EU evaluation were used to calculate Predicted Environmental Concentrations (PECs) for the three active substances and their metabolites for the intended use patterns. In cases where deviations from the EU agreed endpoints were considered appropriate (for example when additional studies are provided), such deviations were highlighted and justified accordingly.

The PECs of fosetyl-aluminium, folpet, cymoxanil and their metabolites in soil, surface water and groundwater has been assessed according to FOCUS guidance documents, with standard FOCUS scenarios to obtain outputs from the FOCUS models, and the endpoints established in the EU evaluation or agreed in the assessment based on new data provided.

PECsoil and PECsw derived for the three active substances and their metabolites are used for the ecotoxicological risk assessment, and mitigation measures are proposed.

PECgw for the three active substances and their metabolites do not exceed the trigger of 0.1 µg/L. Therefore, no unacceptable risk of groundwater contamination is expected for the intended uses.

Based on vapour pressure, information on volatilisation from plants and soil, and DT₅₀ calculation, no significant contamination of the air compartment is expected for the intended uses.

3.1.6 Ecotoxicology

3.1.6.1 Effects on Terrestrial Vertebrates

The obtained TER values for birds and terrestrial vertebrates are above the trigger of 10 for acceptable acute risk, and of 5 for acceptable long-term risk.

3.1.6.2 Effects on Aquatic Species

The risk assessment for aquatic organisms was carried out by comparing the worst-case PEC_{sw} values with the acute and long-term toxicity endpoints.

The risk for aquatic organisms is acceptable if a buffer zone of 5m including a vegetative filter strip of 5m to water bodies is respected. Furthermore a vegetative buffer strip of 5 m to limit the risk of eutrophication from increase of phosphorus concentrations in water bodies due to fosetyl-Al is necessary.

3.1.6.3 Effects on Bees and Other Arthropod Species

Bees

All the hazard quotients are below 50, indicating that the active substances and the formulation pose an acceptable risk to bees. Therefore, an acceptable risk to bees is expected from the application of VITIPEC GOLD WG ADVANCE according to the recommended use pattern.

Other non-target arthropods

VITIPEC GOLD WG ADVANCE						
<i>Aphidius rhopalosiphi</i> (Tier II, 2D)	> 6900	6900	42.0	< 1	0.001	< 1
<i>Typhlodromus pyri</i> (Tier II, 2D)	4881			1.4	0.004	

It is not possible to conclude to an acceptable risk for non-target arthropods following the application of the formulation FOSETYL + FOLPEL + CYMOXANIL (50+25+4) SAPEC WG according to the application patterns (HQ for *T. pyri* estimated to be 1.4 and thus higher than the trigger of 1). However, the HQ value for *T. pyri* is close to the trigger value. In addition, all actives substances are quickly degraded (DT₅₀ soil: folpet 4.3 days; fosetyl 3 hours; cymoxanil 1.3 days) and it is possible to assume that, due to the rapid degradation of active substances, a potential recovery of the affected populations of arthropods could occur within an acceptable period (within 1 year). However, as this potential of recovery is not clearly demonstrated by data and because no data on additional species was provided by the applicant, despite a request for additional data made by the zRMS, a buffer zone of 20 m from non-agricultural land is considered required to conclude to an acceptable risk for non-target arthropods.

3.1.6.4 Effects on Earthworms and Other Soil Macro-organisms

The acute and chronic TER values for VITIPEC GOLD WG ADVANCE active substances and metabolites are greater to than the triggers of 10 and 5, respectively, indicating an acceptable risk to earthworms following application of VITIPEC GOLD WG ADVANCE for the proposed use.

3.1.6.5 Effects on organic matter breakdown

No studies on effects on soil microbial activity were carried out with VITIPEC GOLD WG ADVANCE, since the three active substances are not expected to pose a risk to soil microflora, and are not expected to show any synergistic or additive effects.

This supports the conclusion that under field conditions, use of VITIPEC GOLD WG ADVANCE at the proposed rates poses no unacceptable risk to non-target soil micro-organisms.

3.1.6.6 Effects on Soil Non-target Micro-organisms

No studies on effects on soil microbial activity were carried out with VITIPPEC GOLD WG ADVANCE, since the three active substances are not expected to pose a risk to soil microflora, and are not expected to show any synergistic or additive effects.

This supports the conclusion that under field conditions, use of VITIPPEC GOLD WG ADVANCE at the proposed rates poses no unacceptable risk to non-target soil micro-organisms.

3.1.6.7 Assessment of Potential for Effects on Other Non-target Organisms (Flora and Fauna)

VITIPPEC GOLD WG ADVANCE poses no unacceptable risk to terrestrial non-target plants in off-crop areas following the proposed uses.

3.1.7 Efficacy

Considering the data submitted:

- ✓ The efficacy of VITIPPEC GOLD WG ADVANCE can be considered satisfactory for grape.
- ✓ The selectivity of VITIPPEC GOLD WG ADVANCE is considered satisfactory.
- ✓ The risk of negative impact (yield, quality, transformation processes, propagation, succeeding and adjacent crops) is considered negligible.
- ✓ The possible occurrence or the development of resistance can be considered low to moderate. Resistance monitoring is requested.

3.2 Conclusions arising from French assessment

Taking into account the above assessment, an authorisation **cannot be granted because of unacceptable worker, resident and bystander exposures**. A copy of the Decision issued can be found in Appendix 1 – Copy of the product Decision.

3.3 Substances of concern for national monitoring

No information stated.

3.4 Further information to permit a decision to be made or to support a review of the conditions and restrictions associated with the authorisation

3.4.1 Post-authorisation monitoring

N/A

3.4.2 Post-authorisation data requirements

N/A

3.4.3 Label amendments (see label in Appendix 2):

N/A

Appendix 1 – Copy of the French Decision



Décision relative à une demande d'autorisation de mise sur le marché d'un produit phytopharmaceutique

Vu les dispositions du règlement (CE) N° 1107/2009 du 21 octobre 2009 et de ses textes d'application,

Vu le code rural et de la pêche maritime, notamment le chapitre III du titre V du livre II des parties législative et réglementaire,

*Vu la demande d'autorisation de mise sur le marché du produit phytopharmaceutique **VITIEPEC GOLD WG ADVANCE***

de la société SAPEC AGRO France

enregistrée sous le n°2016-2612

Vu les conclusions de l'évaluation de l'Anses du 12 octobre 2018,

Considérant que l'estimation de l'exposition est supérieure au niveau acceptable d'exposition au fosétyl-aluminium, au folpel et au cymoxanil pour le travailleur et au cymoxanil pour les résidents et les personnes présentes,

Considérant qu'il ne peut pas être établi que les exigences mentionnées à l'article 29 du règlement (CE) n°1107/2009 sont respectées,

La mise sur le marché du produit phytopharmaceutique désigné ci-après **n'est pas autorisée** en France.



Informations générales sur le produit	
Nom du produit	VITIEPEC GOLD WG ADVANCE
Type de produit	Produit de référence
Titulaire	SAPEC AGRO France 2/12 Chemin des Femmes, Immeuble l'Odysée -A-3°, 91300 MASSY, France
Formulation	Granulé dispersable (WG)
Contenant	40 g/kg - cymoxanil 250 g/kg - folpel 500 g/kg - fosétyl d'aluminium
Numéro d'intrant	9909-2016.01
Numéro d'AMM	-
Fonction	Fongicide
Gamme d'usage	Professionnel

A Maisons-Alfort le, 12 NOV. 2018

Françoise WEBER
Directrice générale déléguée
en charge du pôle produits réglementés
Agence nationale de sécurité sanitaire de
l'alimentation, de l'environnement et du travail (ANSES)



ANNEXE I : Conditions de mise sur le marché demandées

Liste des usages refusés			
Usages	Dose d'emploi	Nombre maximum d'applications	Délai avant récolte (jours)
12703203 Vigne*Trt Part.Aer.*Mlidiou(s)	3 kg/ha	3/an	28
Motivation du refus : L'usage est refusé en raison d'un risque d'effet nocif pour les travailleurs, les résidents et les personnes présentes.			

VITPEEC GOLD WG ADVANCE
AMM n°-

Appendix 2 – Copy of the draft product label as proposed by the applicant

VITIEPEC GOLD WG ADVANCE

SAPEC AGRO S.A.
Page 1 of 8

FONGICIDE

VITIEPEC GOLD WG ADVANCE

Granulés dispersibles (WG)

contenant 50% de Fosetyl-al, 25 % de Folpel et 4% de Cymoxanil

Fongicide contre le mildiou de la vigne

Autorisation de Mise sur le Marché n° XXXXXX

« RÉSERVÉ À UN USAGE EXCLUSIVEMENT PROFESSIONNEL »

Homologué par: XXXXXX

Lot N°

Date de fabrication:



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VITIEPEC GOLD WG ADVANCE

SAPEC AGRO S.A.
Page 2 of 8

VITIEPEC GOLD WG ADVANCE	
Granulés dispersibles contenant 50% de Fosetyl-al, 25 % de Folpel et 4% de Cymoxanil	
AMM n° XXXXXX	
ATTENTION	
	
H332 :	Nocif par inhalation
H351 :	Susceptible de provoquer le cancer
H317 :	Peut provoquer une allergie cutanée
H361fd :	Susceptible de nuire à la fertilité. Susceptible de nuire au fœtus
H411 :	Toxique pour les organismes aquatiques, entraîne des effets néfastes à long terme
P102:	Tenir hors de portée des enfants
P202	Ne pas manipulé avant d'avoir lu et compris toutes les précautions de sécurité
P261	Eviter de respirer les poussières/fumées/gaz/brouillards/vapeurs/ aérosols
P273	Éviter le rejet dans l'environnement
P280	Porter des gants de protection/des vêtements de protection/un équipement de protection des yeux/du visage
P303+P361+P353	EN CAS DE CONTACT AVEC LA PEAU (ou les cheveux): Enlever immédiatement les vêtements contaminés. Rincer la peau à l'eau/se doucher
P308+P313	EN CAS d'exposition prouvée ou suspectée : consulter un médecin
P309+P310+P101	EN CAS d'exposition ou d'un malaise: Appeler immédiatement un CENTRE ANTIPOISON ou un médecin. En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette
P391	Recueillir le produit répandu
P510	Éliminer le contenu/récipient conformément à la réglementation nationale
Condition d'emploi	
EUH401	Respectez les instructions d'utilisation afin d'éviter les risques pour la santé humaine et l'environnement.
- Garder sous clef.	
- Délai de rentrée des travailleurs dans la zone traitée : 48 heures après traitement	
- SP1 - Ne pas polluer l'eau avec le produit ou son emballage. Ne pas nettoyer le matériel d'application près des eaux de surface. Eviter la contamination via les systèmes d'évacuation des eaux à partir des cours de ferme ou des routes	
- SPe3 - Pour protéger les organismes aquatiques, respecter une ZNT de 5 mètres par rapport aux points d'eau, comportant un dispositif végétalisé permanent non traité d'une largeur de 5 mètres en bordure des points d'eau.	
- SPe3 - Pour protéger les arthropodes non cibles, respecter une zone non traitée de 20 mètres par rapport à la zone non cultivée adjacente	
Ne se débarrasser de ce produit et de son récipient qu'en prenant toutes les précautions d'usage.	
Distributeur :	

La fiche de données de sécurité est disponible sur demande chez votre fournisseur de produits phytopharmaceutiques et elle est également téléchargeable et imprimable à partir des sites www.sapecagro.fr et www.quickfds.com.

En cas d'urgence appelez le n° 15 ou le Centre Anti-poison (Paris : 01 40 05 48 48) puis signalez vos symptômes au réseau Phyt'attitude, n° vert 0 800 887 887 (appel gratuit depuis un poste fixe).

Fabriqué au PORTUGAL

Contenu : XX KG

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VITIEPEC GOLD WG ADVANCE

SAPEC AGRO S.A.
Page 3 of 8

VITIEPEC GOLD WG ADVANCE – Marque déposée par SAPEC AGRO
SAPEC AGRO, S.A. Avenida do Rio Tejo - Herdade das Praias, 2910-440 Setúbal – Portugal

VITIEPEC GOLD WG ADVANCE
50% de Fosetyl-al, 25 % de Folpel et 4% de Cymoxanil

Présentation et mode d'action

VITIEPEC GOLD WG ADVANCE est une association équilibrée de fosétyl-Al, de folpel et de cymoxanil, destinée à la lutte contre le mildiou de la vigne.

Le fosétyl-Aluminium est un fongicide à systémie ascendante et descendante de la famille chimique de phosphonates. Il pénètre rapidement dans la vigne et se répartit dans toute la plante, assurant la protection des organes néoformés. Le fosétyl-Al stimule les défenses naturelles de la vigne contre le mildiou. Il a également une activité directe sur la germination des spores et la croissance mycélienne.

Le cymoxanil diffuse localement et possède une action à la fois préventive sur la germination des spores et curative de 1 à 2 jours sur la croissance du mycélium dans la feuille, dans la limite de 25% de la période d'incubation du champignon.

Le folpel (famille des phtalamides) est un anti-mildiou multisite qui agit préventivement par contact sur la germination des spores, en intervenant au niveau de la respiration mycélienne, de la perméabilité membranaire et de la division cellulaire du champignon.

USAGES, DOSES, SPECIFICATIONS D'USAGE, DELAI AVANT RECOLTE (DAR), ZONE NON TRAITEE (ZNT).

Culture	Cibles & Usages	Nb maximal d'application	Intervalle entre applications	Dose maximale d'emploi	Stade d'application	DAR	ZNT (en m)
Vigne	Mildiou	3	12-14 jours	3 kg/ha	BBCH 53-85 (raisin de cuve) BBCH 53-69 (raisin de table)	28 jours (raisin de cuve) DAR F BBCH69 (raisin de table)	20*

* Voir phrases SPe3

Les limites maximales de résidus sont disponibles sur le site : <http://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=homepage&language=EN>

Seuls les usages précisés dans le tableau ci-dessus sont préconisés par SAPEC AGRO. Tout élargissement à d'autres usages tels que ceux notifiés dans l'arrêté du 26 mars 2014 n'engage en aucune façon la responsabilité de SAPEC AGRO.

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VITIEPEC GOLD WG ADVANCE

SAPEC AGRO S.A.
Page 4 of 8

RECOMMANDATION D'UTILISATION

VITIEPEC GOLD WG ADVANCE s'utilise dans la lutte contre le mildiou de la vigne (*Plasmopara viticola*).

Traiter préventivement avec VITIEPEC GOLD WG ADVANCE quand les conditions sont favorables au mildiou (suivre les Bulletins de Santé du Végétal). VITIEPEC GOLD WG ADVANCE peut s'utiliser dès l'apparition de l'inflorescence (Stade BBCH 53) et jusqu'à la véraison (BBCH 85), dans la limite de 3 applications par saison.

VITIEPEC GOLD WG ADVANCE peut être utilisé à la cadence de 12-14 jours. Néanmoins, en cas de forte pression du mildiou, l'intervalle entre 2 traitements pourra être réduit à 10 jours. Si VITIEPEC GOLD WG ADVANCE est suivi par un traitement de contact, ce dernier doit intervenir au plus tard 12 jours après VITIEPEC GOLD WG ADVANCE (8 jours en cas de forte pression).

VITIEPEC GOLD WG ADVANCE peut exceptionnellement être utilisé en traitement curatif dans un délai de un à deux jours après une contamination par le mildiou, dans la limite de 25% de la période d'incubation du champignon. Sur attaque déclarée (taches de mildiou visibles), appliquer VITIEPEC GOLD WG ADVANCE dès que possible, puis renouveler la protection 5 à 6 jours après avec un fongicide curatif d'un autre mode d'action.

VITIEPEC GOLD WG ADVANCE est sélectif de la plupart des variétés de raisin de cuve. En cas de doute, il est recommandé de faire un essai préalable.

Ne pas utiliser VITIEPEC GOLD WG ADVANCE en culture de vigne sous serre.

Gestion du risque de résistance

Le cymoxanil appartient à la famille des Cyanoacetamide-oximes classés dans le groupe 27 de la classification du FRAC (Fungicide Resistance Action Committee). Afin de limiter les risques d'apparition de résistances, veiller à ne pas construire un programme anti-mildiou s'appuyant uniquement sur des produits contenant du Cymoxanil. L'utilisation répétée, sur une même parcelle, de préparations à base de substances actives de la même famille chimique ou ayant le même mode d'action, peut conduire à l'apparition d'organismes résistants.

Rognage

Le Fosétyl-al de VITIEPEC GOLD WG ADVANCE protège les pousses formées entre 2 traitements. Si un rognage est nécessaire, nous conseillons de le réaliser avant le traitement avec VITIEPEC GOLD WG ADVANCE.

Préparation de la bouillie

Remplir à moitié d'eau la cuve du pulvérisateur.

Mettre l'agitation en marche avant de verser progressivement la quantité nécessaire de VITIEPEC GOLD WG ADVANCE, puis compléter avec de l'eau jusqu'au volume final.

Laisser l'agitateur en fonctionnement pendant le trajet et jusqu'à la fin de la pulvérisation. La bouillie ainsi obtenue devra être utilisée dans les 24 heures qui suivent sa préparation.

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VITPEEC GOLD WG ADVANCE

SAPEC AGRO S.A.
Page 5 of 8

Application

Il est indispensable de soigner la pulvérisation par une application homogène et d'assurer une bonne couverture de la végétation. Adapter le volume de bouillie en fonction du stade de développement du végétal et du matériel de pulvérisation utilisé.

Une application sur chaque face de chaque rang est fortement conseillée. SAPEC AGRO interdit formellement les applications réalisées à l'aide d'un pulvérisateur à dos ; la qualité de pulvérisation étant trop irrégulière.

Mélange

En cas de mélanges, veillez à toujours introduire VITPEEC GOLD WG ADVANCE en premier dans la cuve. Veuillez également vous rapprocher de votre technicien habituel ou contacter SAPEC AGRO en cas de doute sur un mélange.

Ne pas mélanger VITPEEC GOLD WG ADVANCE avec les produits à base de cuivre et les engrais foliaires contenant de l'azote.

Les mélanges doivent être mis en œuvre conformément à la réglementation en vigueur et aux recommandations des guides de bonnes pratiques officiels.

Consulter le site : <https://ephy.anses.fr/>

Protection de l'utilisateur

Il convient de rappeler que l'utilisation d'un matériel adapté et entretenu et la mise en œuvre de protections collectives constituent la première mesure de prévention contre les risques professionnels, avant la mise en place de protections complémentaires comme les protections individuelles.

En tout état de cause, le port de combinaison de travail dédiée ou d'EPI doit être associé à des réflexes d'hygiène (ex : lavage des mains, douche en fin de traitement) et à un comportement rigoureux (ex : procédure d'habillage/déshabillage). Les modalités de nettoyage et de stockage des combinaisons de travail et des EPI réutilisables doivent être conformes à leur notice d'utilisation.

- Pour l'opérateur, porter :

Dans le cadre d'une application effectuée à l'aide d'un pulvérisateur pneumatique

- **Pendant le mélange/chargement**
 - Gants en nitrile certifiés EN 374-3
 - Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant
 - EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée
 - Protections respiratoires certifiées : demi-masque certifié (EN 140) équipé d'un filtre P3 (EN143) ou A2P3 (EN 14387)

- **Pendant l'application – pulvérisation vers le haut**

Si application avec tracteur avec cabine :

- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage d'au moins 230 g/m² ou plus avec traitement déperlant

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VITIEPEC GOLD WG ADVANCE

SAPEC AGRO S.A.

Page 6 of 8

- Gants en nitrile certifiés EN 374-2 à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation. Dans ce cas, les gants ne doivent être portés qu'à l'extérieur de la cabine et doivent être stockés après utilisation à l'extérieur de la cabine.

Si application avec tracteur sans cabine :

- Combinaison de protection de catégorie III type 4 avec capuche
- Gants en nitrile certifiés EN 374-2 à usage unique, dans le cas d'une intervention sur le matériel pendant la phase de pulvérisation.

• **Pendant le nettoyage du matériel de pulvérisation**

- Gants en nitrile certifiés EN 374-3
- Combinaison de travail en polyester 65 %/coton 35 % avec un grammage de 230 g/m² ou plus avec traitement déperlant
- EPI partiel (blouse ou tablier à manches longues) de catégorie III et de type PB (3) à porter par-dessus la combinaison précitée

Dans le cadre d'une application effectuée à l'aide d'un pulvérisateur à dos

• **Pendant le mélange/chargement**

- Gants en nitrile certifiés EN 374-3
- Combinaison de protection de catégorie III type 4
- Protections respiratoires certifiées : demi-masque certifié (EN 140) équipé d'un filtre P3 (EN143) ou A2P3 (EN 14387)

• **Pendant l'application**

- Combinaison de protection de catégorie III type 4 avec capuche
- Bottes de protections certifiées EN 13 832-3
- Gants en nitrile certifiés EN 374-3

• **Pendant le nettoyage du matériel de pulvérisation**

- Gants en nitrile certifiés EN 374-3
- Combinaison de protection de catégorie III type 4

Travailleur

Dans les cas où le travailleur serait amené à intervenir sur les parcelles traitées et si justifié suite à l'évaluation des risques qui peut intégrer un délai de rentrée (DRE) : combinaison de travail polyester 65 %/coton 35 % avec un grammage d'au moins 230 g/m² avec traitement déperlant et gants en nitrile certifiés EN 374-3.

Le port d'une combinaison de travail dédiée ou d'EPI doit être associé à des réflexes d'hygiène (ex : lavage des mains, douche en fin de traitement) et à un comportement rigoureux (ex : procédure 'habillage/déshabillage). Les modalités de nettoyages et de stockage des combinaisons de travail et des EPI réutilisables doivent être conformes à leur notice d'utilisation.

Précaution d'emploi

- **Stockage :**

- Conserver le produit sous clé, dans son emballage d'origine, dans un endroit frais, à l'abri de l'humidité et à l'écart des aliments et boissons, y compris ceux des animaux.
- Conserver hors de la portée des enfants.

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VITIEPEC GOLD WG ADVANCE

SAPEC AGRO S.A.

Page 7 of 8

- Application :

- Ne pas traiter les cours d'eau et fossés en eau. Appliquer la bouillie dans les cultures par temps calme, sans vent fort, pour éviter toute dérive de pulvérisation vers les fossés, cours d'eau, chemins, abords de ferme ou bâtiments.
- Nettoyer très soigneusement et rincer les pulvérisateurs aussitôt après le traitement.
- Appliquer, après dilution, les fonds de cuve conformément à la législation en vigueur.
- Changer de vêtements et se rincer les mains et le visage à l'eau savonneuse immédiatement après l'utilisation.

- Emballage :

- Réemploi de l'emballage interdit ; rincer soigneusement trois fois le bidon en veillant à verser l'eau de rinçage dans la cuve du pulvérisateur, ou dans la cuve de rinçage pour l'injection directe.
- Éliminer les emballages vides via une collecte organisée par un service de collecte spécifique (ADIVALOR).
- Pour l'élimination des produits non utilisables, contacter votre fournisseur de produits phytopharmaceutiques habituel ou faire appel à une entreprise habilitée pour la collecte et l'élimination des produits dangereux.

Important

Lire les instructions ci-jointes avant l'emploi.

Respecter les usages, doses, conditions et précautions d'emploi mentionnées sur l'emballage. Ces éléments ont été déterminés en fonction des caractéristiques du produit et des applications pour lesquelles il est préconisé. Conduisez sur ces bases, la culture et les traitements selon la bonne pratique agricole en tenant compte, sous votre responsabilité, de tous facteurs particuliers concernant votre exploitation, telles que la nature du sol, les conditions météorologiques, les méthodes culturales, les variétés végétales, la résistance des espèces...Le fabricant garantit la qualité de ses produits vendus dans leur emballage d'origine ainsi que leur conformité à l'autorisation de vente de l'ANSES. Compte tenu de la diversité des législations existantes, il est recommandé, dans le cas où les denrées issues des cultures protégées avec cette spécialité sont destinées à l'exportation, de vérifier la réglementation en vigueur dans le pays importateur.

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Appendix 3 – Letter(s) of Access

Provided upon request.